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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FERNALD
LOG D-000605

2000 FEB 21 A 8:34

6446.6C14

FEB 20 2000

REPLY TO THE ATTENTION OF: SRF-5J

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

RE: A9 Phase 2 Certification
Design Letter

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) draft Certification Design Letter (CDL) for Area 9 (A9), Phase 2. The CDL presents the certification approach for Area 9, Phase 2.

U.S. EPA has several comments on the Area 9, Phase 2 CDL that need to be addressed. Therefore U.S. EPA disapproves the Area 9, Phase 2 CDL pending receipt of adequate responses to the attached comments.

U.S. DOE must submit responses to comments and a revised document within thirty (30) days receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Sally Robison, U.S. DOE-HDQ
Jamie Jameson, FERMCO
Terry Hagen, FERMCO
Tim Poff, FERMCO

TECHNICAL REVIEW COMMENTS ON "CERTIFICATION DESIGN LETTER FOR AREA 9, PHASE II"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.1 Page #: 2-1 Lines #: 29 and 30
Original Specific Comment #: 1
Comment: The text does not list the above-Final Remediation Level (FRL) radionuclides that were targeted during Removal Action 14, nor does it present justification for removing only most of the above-FRL radionuclides instead of all of them. The text should be revised to include this information.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.1.2 and 2.1.3 Page #: 2-2 Lines #: NA
Original Specific Comment #: 2
Comment: The text acknowledges sampling results above the off-property FRLs during Predesign Investigation activities, and Section 2.3 provides a reason for the exceedances. However, no such acknowledgment or reason is provided for above-FRL results associated with Removal Action 14 confirmation sampling. The text should be revised to include this information.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.1.3 Page #: 2-2 Lines #: 22 and 23
Original Specific Comment #: 3
Comment: The text states that two borings exhibited sampling results above the off-property FRL for beryllium. The results listed in the text (0.91 and 0.62 milligrams per kilogram) are inconsistent with the values listed in Appendix A. The text or appendix should be revised for accuracy.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.2 Page #: 2-3 Lines #: 28 and 29
Original Specific Comment #: 4
Comment: The text states that Phase II confirmation measurements were not necessary because Phase I measurements were performed with high-purity germanium detectors. The text should be revised to explain why the sodium iodide measurements were omitted.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Figure 2-2 Pages #: NA Lines #: NA
Original Specific Comment #: 5
Comment: The figure indicates that ten results from Removal Action 14 confirmation sampling were above FRL. According to Appendix A, only three of the ten results listed were above the FRLs. The figure or Appendix should be revised for accuracy and all results above FRLs should be referenced in the text.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Appendix A Page #: NA Lines #: NA
Original Specific Comment #: 6
Comment: The appendix lists sampling locations G2 and I4 as having uranium 238 concentrations of "-99" pico-Curies per gram. The appendix should be revised to clarify the meaning of the "-99" value.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Appendix A Pages #: NA Lines #: NA
Original Specific Comment #: 7
Comment: The appendix should be revised to define all abbreviations and symbols used in the tables. In addition, for each sample, the appendix should identify the associated sampling event and the sampling date.